

PRA/OMB SORN PROCESSING

Reference: DoD 8910.1-M

- 1) Action Officer initiates SORN process with Component Privacy Office.
- 2) Privacy Officer receives/reviews the "Category of Individuals" information. If this section includes ANY members of the public, Privacy will send the draft SORN to the Component IMCO for PRA review. If the Privacy Officer determines that there are NO members of the public involved in this system, the Component Privacy Office can continue the SORN process up to DPCLO.
 - a. This may require additional communication between the Action Officer and the Privacy Officer. For example, if the Category of Individuals lists "Army Personnel," Privacy should ask whether this includes contractors, retired military, other members of industry working on the Army installation, etc. in order to determine whether or not members of the public are affected.
- 3) IF THERE ARE MEMBERS OF THE PUBLIC: The Component IMCO will review the information contained in the SORN and Narrative Statement for a PRA Requirement. The IMCO will look at items such as:
 - a. The nature, as well as the extent, of the information being requested.
 - b. Possible exemptions which may apply to the information being collected.
 - c. Other collections in the Component/DoD/Federal Government which may apply in order to avoid duplication of information.
- 4) IMCO DETERMINES THAT THERE IS NO PRA REQUIREMENT:
 - a. Action Officer/Privacy Officer completes Section 9 of the Narrative Statement with full detail of review, and Privacy will continue their process to finalize the SORN.
- 5) IMCO DETERMINES THAT THERE IS A PRA REQUIREMENT:
 - a. The Privacy Officer is notified by the IMCO that the collection falls under the PRA. The Privacy Officer advises the Action Officer that the PRA process must be completed prior to moving forward with the SORN.
 - b. The Action Officer and the IMCO work together to complete the entire OMB process, including the 60 day notice, the necessary coordinations, 30 day notice, and submission documents comprising PRA package the is submitted to OMB.
 - c. Once the PRA package has been submitted by the DoD Public Collections Team at IMD to OMB for review, the IMCO notifies the Privacy Officer. Section 9 of the Narrative Statement needs to be completed by the Action Officer/Privacy Officer with the date the PRA package was submitted to OMB.
- 6) When either Step 4 or Step 5 has been completed, the Component Privacy Office may send the SORN forward to DPCLO.
- 7) DPCLO will review and ultimately send the finalized SORN to the Federal Register for publication (30 day comment period).
- 8) When the SORN reaches IMD, the DoD Public Collections Team will review the Narrative Statement and SORN language to ensure all PRA requirements are accounted for and that Section 9 of the Narrative Statement was properly completed.

*Please note that SORNs which do not have Section 9 of the Narrative Statement completed when it goes to the Federal Register will be returned to DPCLO for revision and may be resubmitted once completed. SORNs will NOT be held at the DoD Level.

** If the IMD Public Collections team identifies a PRA requirement in a SORN sent for publication, the SORN will be returned to DPCLO and sent back to the component to complete steps 3 – 8. The SORN may be resubmitted to the Federal Register once the requirements have been met.

SORN/PRA OWNERSHIP

STEP	ACTION	OWNERSHIP
1	Initiation of SORN process by Action Officer.	Component Privacy Office
2	Determining Individuals involved (Public vs. Internal).	Component Privacy Office
	IF INTERNAL - Move forward with Privacy SORN process.	Component Privacy Office
3	IF PUBLIC – IMCO reviews SORN information for PRA requirement.	Component IMCO
4	IMCO determines that there is no PRA requirement and notifies Privacy Officer.	Component Privacy Office
5	IMCO determines that there is a PRA requirement and notifies Privacy Officer. Privacy Officer advises Action Officer to get in touch with the IMCO.	Program Action Officer
	Action Officer works with IMCO to complete PRA requirement	Program Action Officer
	PRA process is complete. IMCO notifies Privacy Officer of submission date to OMB.	Component IMCO
6	After either Step 4 or Step 5, Privacy Officer finalizes SORN to send forward to DPCLO.	Component Privacy Office
7	DPCLO finalizes SORN and sends to Federal Register for Publication.	DPCLO
8	IMD Public Collections Team completes SORN review	IMD
	Public Collections Team clears the SORN as meeting all requirements, and SORN is returned to Federal Register for publication.	IMD
	Public Collections Team identifies a PRA requirement which has not been completed and returns SORN to DPCLO for additional revision or processing.	DPCLO/ Component Privacy Office